



# Oregon

Theodore Kulongoski, Governor

## Department of Environmental Quality

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October 2, 2007

*Also Sent Via E-mail*

Mr. Robert J. Wyatt  
Northwest Natural  
220 N.W. Second Avenue  
Portland, OR 97209

**Re: Final Cyanide Surface Water Field Sampling Plan  
Northwest Natural Gas Company - Gasco Site  
Portland, Oregon  
ECSI No. 84**

Dear Mr. Wyatt:

This letter provides Oregon Department of Environmental Quality (DEQ) approval of the "Final Field Sampling Plan, Cyanide Surface Water Investigation, Gasco Groundwater Source Evaluation" dated September 2007 (Final Surface Water FSP). Anchor Environmental, LLC (Anchor) prepared the Final Surface Water FSP on behalf of the Northwest Natural Gas Company (NWNG). The Final Surface Water FSP provides the scope of work and sampling and analytical plan for assessing the concentrations of cyanide (i.e., total, amenable, and free forms) in the Willamette River offshore from the property owned by NWNG.

DEQ's comments to the Draft Surface Water FSP<sup>1</sup> were communicated to NWNG in a letter dated August 30, 2007. NWNG transmitted a revised version of the document as an attachment to an e-mail dated September 25, 2007. DEQ discussed the revised document with Anchor by telephone on September 26<sup>th</sup>, during which DEQ verbally approved implementing the Final Surface Water FSP.

This approval letter acknowledges that the Final Surface Water FSP: 1) reflects agreements reached between DEQ and NWNG regarding implementation of the field sampling and analytical program, and 2) addresses DEQ's August 30th comments.

Although DEQ has approved the Final Surface Water FSP, a clarifying comment regarding Section 2 of the document is provided below.

- Appendix A provides copies of DEQ's August 30th comments to the Draft Surface Water FSP followed by NWNG's responses. DEQ's comment to Section 2 (i.e., Oregon DEQ Specific Comment 2) discusses sampling stations located north (i.e., GSW-01, GSW-02) and south (i.e., GSW-19, and GSW-20) of the NWNG property lines. Based on discussions with Anchor, DEQ understands that these sampling stations are considered to be "upstream" or "downstream" of the NWNG property depending on the river current direction measured at the time of sampling. In other

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<sup>1</sup> Anchor Environmental, LLC, 2007, "Draft Field Sampling Plan, Cyanide Surface Water Investigation, Gasco Groundwater Source Evaluation", July, a work plan prepared on behalf of the Northwest Natural Gas Company.

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words, either station pair GSW-01/GSW-02 or GSW-19/GSW-20 could be considered to be upstream or downstream of the site depending on the direction of the current. DEQ further understands from that NWNG intends to use data from stations located “downstream” of the site to “determine dilution of potential sources from the site,” and from stations located “upstream” to “evaluate background levels.”

For clarification, DEQ considers the data collected from the four referenced stations to be useful for evaluating surface water chemistry at multiple depth intervals within the water column under prevailing conditions of river stage, current, and flow at the time of sample collection. DEQ considers it premature to discuss the data collected from these four stations in terms that have connotations regarding contaminant distribution and/or concentration trends.

DEQ appreciates Siltronic’s ongoing efforts to evaluate and address uplands contamination associated with releases from the facility. Please don’t hesitate to contact me if you have any questions regarding this letter.

Sincerely,

Dana Bayuk, R.G.  
Project Manager  
Cleanup & Lower Willamette Section

Cc: Sandy Hart, NWNG  
Patty Dost, Schwabe Williamson & Wyatt  
Rob Ede, Hahn & Associates  
John Edwards, Anchor Environmental  
Carl Stivers, Anchor Environmental  
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